

Objection Deadline: October 16, 2023

BURNS BAIR LLP

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*Special Insurance Counsel to the Official Committee
of Unsecured Creditors of The Roman Catholic Diocese
of Rockville Centre, New York*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

THE ROMAN CATHOLIC DIOCESE OF
ROCKVILLE CENTRE, NEW YORK,
Debtor.

Chapter 11

Case No. 20-12345 (SCC)

**THIRTY-FOURTH MONTHLY FEE STATEMENT OF BURNS BAIR LLP,
AS SPECIAL INSURANCE COUNSEL TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR PROFESSIONAL SERVICES RENDERED
AND DISBURSEMENTS INCURRED FOR THE PERIOD FROM
AUGUST 1, 2023 THROUGH AUGUST 31, 2023**

Name of Applicant:	<u>Burns Bair LLP</u>
Authorized to Provide Professional Services to:	<u>Official Committee of Unsecured Creditors</u>
Date of Retention:	Effective October 29, 2020 pursuant to Order dated December 9, 2020 [Docket No. 246]
Period for which compensation and reimbursement is sought:	<u>August 1, 2023 – August 31, 2023</u>
Amount of Compensation sought as actual, reasonable, and necessary:	<u>\$118,810.60</u> <u>80% of which is \$95,048.48</u>
Amount of Expense Reimbursement sought as actual, reasonable, and necessary:	<u>\$0</u>
TOTAL (80% of fees and 100% of costs)	<u>\$95,048.48</u>

This is the thirty-fourth monthly fee statement.

PRELIMINARY STATEMENT

Burns Bair LLP (“Burns Bair”), as Special Insurance Counsel to the Official Committee of Unsecured Creditors (the “Committee”) of The Roman Catholic Diocese of Rockville Centre, New York (the “Debtor”), hereby submits this thirty-fourth monthly statement (the “Monthly Statement”) for the period from August 1, 2023 through August 31, 2023 (the “Statement Period”) for payment of professional services rendered and reimbursement of expenses incurred during the Statement Period pursuant to the Court’s *Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* dated November 4, 2020 [Docket No. 129] (the “Interim Compensation Order”). Burns Bair requests interim allowance and payment of compensation in the amount of \$95,048.48 (80% of \$118,810.60) for fees on account of reasonable and necessary professional services rendered to the Committee by Burns Bair.

FEES FOR SERVICES RENDERED DURING THE STATEMENT PERIOD

1. Set forth below is a list of the positions of the Burns Bair professionals and paraprofessionals who provided services to the Committee during the Statement Period, their respective billing rates, and the aggregate hours spent by each professional and paraprofessional in providing services on behalf of the Committee during the Statement Period.

Name	Title	Year of Partnership	Year of Admission	Hourly Rate	Total Hours Billed	Total Compensation
Timothy Burns	Partner	2008	1991	\$975.00	43.20	\$42,120.00
Jesse Bair	Partner	2020	2013	\$625.00	41.80	\$26,125.00
Nathan Kuenzi	Associate	N/A	2020	\$420.00	26.30	\$11,046.00
Brian Cawley	Associate	N/A	2020	\$420.00	74.20	\$31,164.00
Katie Sticklen	Summer Associate	N/A	N/A	\$378.00	20.20	\$7,635.60
Alyssa Turgeon	Paralegal	N/A	N/A	\$360.00	1.20	\$432.00
Brenda Horn-Edwards	Paralegal	N/A	N/A	\$360.00	.80	\$288.00
TOTAL:					207.70	\$118,810.60

2. The rates charged by Burns Bair for services rendered to the Committee are the same rates that it charges generally for professional services rendered to its non-bankruptcy clients. A complete itemization of tasks performed by these professionals and paraprofessionals for the Statement Period is annexed hereto as **Exhibit A**.

NOTICE AND OBJECTION PROCEDURES

3. No trustee or examiner has been appointed in these chapter 11 cases. Pursuant to the Interim Compensation Order, Burns Bair has provided notice of this statement upon the following parties by electronic or first class mail: (a) the Debtor c/o The Roman Catholic Diocese of Rockville Centre, 50 N Park Ave P.O. Box 9023, Rockville Centre, NY 11571-9023 (Attn: Thomas Renker); (b) the attorneys for the Debtor, Jones Day, 250 Vesey Street, New York, NY 10281 (Attn: Corinne Ball, Esq., Benjamin Rosenblum, Esq. and Andrew M. Butler, Esq.); and (c) the Office of the United States Trustee Region 2 (the “U.S. Trustee”), 201 Varick Street, Suite 1006, New York, NY 10014 (Attn: Greg Zipes, Esq. and Shara Cornell, Esq.). Burns Bair submits that no other or further notice need be provided.

4. Pursuant to the Interim Compensation Order, objections to this Monthly Statement, if any, must be served upon the Application Recipients by October 16, 2023 (the “**Objection Deadline**”) setting forth the nature of the objection and the amount of fees or expenses at issue.

5. If no objections to this Monthly Statement are made on or before the Objection Deadline, the Debtor shall pay Burns Bair 80% of the fees and 100% of the expenses set forth above. To the extent an objection to this Monthly Statement is timely made, the Debtor shall withhold payment of that portion of the Monthly Statement to which the objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth above. To

the extent such objection is not resolved; it shall be preserved and presented to the Court at the next interim or final fee application hearing.

Dated: September 28, 2023

BURNS BAIR LLP

/s/ Timothy W. Burns

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*Special Insurance Counsel to the Official
Committee of Unsecured Creditors of The Roman
Catholic Diocese of Rockville Centre, New York*

EXHIBIT A

Burns | Bair

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**The Official Committee of Unsecured Creditors
of The Roman Catholic Diocese of Rockville
Centre**

Issue Date : 9/28/2023

Bill # : 01221

Matter: Insurance

PROFESSIONAL SERVICES RENDERED

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
8/1/2023	Jesse Bair	Participate in Committee meeting for insurance purposes re case mediation and insurance strategy and next-steps (1.5);	1.50	\$937.50
8/1/2023	Brian Cawley	Discuss motion for relief from stay with T. Burns (.1); revise and edit motion to implement partner feedback (3.9);	4.00	\$1,680.00
8/1/2023	Jesse Bair	Review agenda for upcoming Committee meeting (.1);	0.10	\$62.50
8/1/2023	Jesse Bair	Participate in conference with T. Burns re motion to lift stay to send insurance demands (.1);	0.10	\$62.50
8/1/2023	Nathan Kuenzi	Review suggested edits to Arrowood 2004 topics from I. Nasatir (.4);	0.40	\$168.00
8/1/2023	Timothy Burns	Participate in call with J. Stang re Committee meeting agenda and insurance presentation (.3); conference with J. Bair re motion to lift stay to send insurance demands (.1); review and revise motion for relief from stay to send insurance demands (1.8); review agenda for Committee meeting (.1); participate in Committee meeting for insurance purposes re case insurance strategy (1.5);	3.80	\$3,705.00
8/1/2023	Jesse Bair	Review correspondence with K. Dine and the mediators re August mediation session (.1); review Order scheduling mediation (.1);	0.20	\$125.00
8/2/2023	Brian Cawley	Conference with T. Burns and B. J. Bair re motion to lift stay briefing (.2); discuss details of stay and research project with K. Sticklen (.5);	0.70	\$294.00
8/2/2023	Jesse Bair	Review and consider notice of reassignment of the LMI district court action to Judge Subramanian (.1);	0.10	\$62.50

8/2/2023	Jesse Bair	Review correspondence with K. Dine and the mediators re August 25 mediation session (.1);	0.10	\$62.50
8/2/2023	Katie Sticklen	Discuss research project re case law on topic of automatic stay and demand letter correlation to debtor with B. Cawley (.5); research case law regarding automatic stay and demand letter correlation to debtor and if a demand letter can be sent to debtor notwithstanding automatic stay (3.7);	4.20	\$1,587.60
8/2/2023	Jesse Bair	Conference with T. Burns and B. Cawley re motion to lift stay briefing (.2)	0.20	\$125.00
8/2/2023	Brian Cawley	Continue drafting motion for relief from stay and implementing partner feedback (5.5);	5.50	\$2,310.00
8/2/2023	Timothy Burns	Review and revise latest draft of motion for relief from stay re insurance demands (1.1); conference with B. Cawley re revisions to same (.3); review and respond to correspondence from the mediators and K. Dine re mediation logistics (.1); conference with J. Bair and B. Cawley re motion to lift stay briefing (.2); review and respond to correspondence from K. Dine re Arrowood (.1); brief review of Arrowood 2004 motion draft (.1); review the Debtor's letter to the district court re removal issues (.2);	2.10	\$2,047.50
8/2/2023	Brian Cawley	Participate in supplemental conference with T. Burns re additional edits and comments on latest version of motion for relief from stay draft (.3);	0.30	\$126.00
8/3/2023	Jesse Bair	Correspondence with I. Nasatir re 2022 Arrowood supervision order (.1);	0.10	\$62.50
8/3/2023	Timothy Burns	Review and revise adversary complaint re potential insurer-Diocese only settlement and Section 349 claim (1.2); conference with N. Kuenzi re revisions to same (.3); review correspondence between J. Bair and BB team re insurance demands (.2); review correspondence from the mediators re upcoming mediations (.1);	1.80	\$1,755.00
8/3/2023	Katie Sticklen	Continue researching case law regarding automatic stay and demand letter correlation to debtor and if a demand letter can be sent to debtor notwithstanding the automatic stay (2.0); conference with B. Cawley re Arrowood demand letter project (.4); analyze POC information in connection with drafting Arrowood insurance demand letters (1.6);	4.00	\$1,512.00
8/3/2023	Jesse Bair	Review correspondence from the mediators re upcoming mediation session (.1);	0.10	\$62.50

8/3/2023	Alyssa Turgeon	Conference with B. Cawley re Arrowood demand letter assignment (.2); analyze Arrowood policy information in connection with drafting Arrowood insurance demand letters (1.0);	1.20	\$432.00
8/3/2023	Jesse Bair	Provide instructions to B. Cawley re preparing Arrowood insurance demands (.2); answer follow-up questions re same (.1);	0.30	\$187.50
8/3/2023	Nathan Kuenzi	Begin revising draft Section 349 complaint based on partner suggestions (1.6);	1.60	\$672.00
8/3/2023	Jesse Bair	Correspondence with K. Dine re Committee insurance strategy PowerPoint (.1);	0.10	\$62.50
8/3/2023	Nathan Kuenzi	Prepare for conference with T. Burns re Section 349 complaint (.1); participate in conference with T. Burns re same and suggested revisions (.3)	0.40	\$168.00
8/3/2023	Brian Cawley	Draft new insurance demand letter language (.2); discuss demand letter project with K. Sticklen (.4); create spreadsheet of relevant insurance demand letter information (.5); discuss demand letter assignment with A. Turgeon (.2); draft Arrowood insurance demand letters (1.3); revise LMI/Allianz insurance demand letters (.5);	3.10	\$1,302.00
8/3/2023	Brian Cawley	Continue drafting revised version of motion for relief from stay to send insurance demands (3.8); research duty to settle and effect of demands in connection with same (2.1);	5.90	\$2,478.00
8/4/2023	Timothy Burns	Review correspondence from co-mediators and PSZJ re mediation (.1);	0.10	\$97.50
8/4/2023	Jesse Bair	Review draft correspondence to the Diocese re potential non-consensual insurance settlements (.1); correspondence with N. Kuenzi re suggested edits to same (.1);	0.20	\$125.00
8/4/2023	Nathan Kuenzi	Continue drafting revised section 349 adversary complaint (4.5);	4.50	\$1,890.00
8/4/2023	Brian Cawley	Continue drafting Arrowood demand letters (3.1); discuss demand letter project with K. Sticklen (.2);	3.30	\$1,386.00
8/4/2023	Nathan Kuenzi	Review communications from J. Bair regarding letter to the Diocese re non-consensual insurance settlements and potential 349 complaint (.1); draft revisions to letter based on same (.3);	0.40	\$168.00
8/4/2023	Katie Sticklen	Continue researching case law regarding automatic stay and demand letter correlation to debtor and if a demand letter can be sent to debtor notwithstanding the automatic stay (4.0); conference with B. Cawley re Arrowood demand letter project (.2); continue analyzing POC information in connection with drafting Arrowood insurance demand letters (3.3);	7.50	\$2,835.00

8/4/2023	Jesse Bair	Review correspondence from the mediators re insurance counters (.1);	0.10	\$62.50
8/4/2023	Nathan Kuenzi	Draft letter to the Diocese re non-consensual insurance settlement issues and potential Section 349 complaint re same (1.8);	1.80	\$756.00
8/4/2023	Jesse Bair	Review monthly Diocese PSIP information (.1);	0.10	\$62.50
8/5/2023	Nathan Kuenzi	Review communications from J. Bair regarding draft derivative standing letter to the Diocese (.2); revise letter based on partner feedback (1.6);	1.80	\$756.00
8/5/2023	Nathan Kuenzi	Review communications from J. Bair regarding draft Section 349 complaint (.1); draft revised version of same to incorporate partner edits (1.5);	1.60	\$672.00
8/5/2023	Jesse Bair	Respond to correspondence with K. Dine and J. Stang re Arrowood 2004 exam issues (.1); participate in call with T. Burns re same (.1);	0.20	\$125.00
8/5/2023	Jesse Bair	Respond to additional correspondence with N. Kuenzi re response letter to the Diocese re potential non-consensual insurance settlements (.1);	0.10	\$62.50
8/5/2023	Jesse Bair	Participate in call with T. Burns re derivative demand letter to the Diocese re Section 349 claim re non-consensual insurance settlements (.1);	0.10	\$62.50
8/5/2023	Timothy Burns	Review and revise draft Section 349 complaint re diocesan-insurer settlement (1.4);	1.40	\$1,365.00
8/6/2023	Brian Cawley	Continue drafting Arrowood demands (2.4);	2.40	\$1,008.00
8/6/2023	Timothy Burns	Review and revise derivative demand letter (.6); review and revise Arrowood 2004 discovery motion and topics (.8);	1.40	\$1,365.00
8/6/2023	Brian Cawley	Draft Burns declaration in support of motion for relief from stay (1.3); draft notice and proposed Order for motion for relief from stay (.6);	1.90	\$798.00
8/7/2023	Jesse Bair	Correspondence with PSZJ team re current draft of Rule 2004 requests to Arrowood (.1);	0.10	\$62.50
8/7/2023	Jesse Bair	Begin reviewing and editing draft motion for partial lift of the stay to send insurance demand letters (2.3); case law research in connection with same (.1); participate in call with B. Cawley re additional edits needed to same (.1); correspondence with B. Cawley re exhibits needed in connection with same (.1);	2.60	\$1,625.00
8/7/2023	Jesse Bair	Begin reviewing and editing draft Section 349 complaint against LMI and Interstate (.3);	0.30	\$187.50
8/7/2023	Brian Cawley	Correspond with J. Bair and T. Burns regarding motion for relief from stay (.5);	0.50	\$210.00
8/7/2023	Jesse Bair	Review recent LMI counter (.1);	0.10	\$62.50

8/7/2023	Nathan Kuenzi	Draft revisions to Arrowood 2004 discovery requests based on feedback from PSZJ and T. Burns (1.0); case law research in connection with same (.6);	1.60	\$672.00
8/7/2023	Katie Sticklen	Continue drafting Arrowood demand letters (4.5);	4.50	\$1,701.00
8/7/2023	Brian Cawley	Draft and prepare exhibits to accompany motion for relief from stay (2.9);	2.90	\$1,218.00
8/7/2023	Jesse Bair	Review and edit draft Section 349 derivative standing letter to the Diocese (.3);	0.30	\$187.50
8/7/2023	Nathan Kuenzi	Revise and edit draft Section 349 complaint and derivative standing letter to the Diocese (.4);	0.40	\$168.00
8/7/2023	Brian Cawley	Incorporate partner feedback into motion for relief from stay (2.7);	2.70	\$1,134.00
8/7/2023	Nathan Kuenzi	Draft further revised version of draft Section 349 complaint to incorporate partner suggestions (1.3); case law research in connection with same (1.2);	2.50	\$1,050.00
8/7/2023	Jesse Bair	Review correspondence from the mediators re September mediation sessions (.1);	0.10	\$62.50
8/7/2023	Jesse Bair	Begin reviewing and editing draft Arrowood 2004 motion (.2);	0.20	\$125.00
8/8/2023	Timothy Burns	Review correspondence between BB and PSZJ re Section 349 complaint and derivative standing letter (.1);	0.10	\$97.50
8/8/2023	Jesse Bair	Review and edit draft 2004 motion re Arrowood exam (1.0); analyze case law re pending proceeding rule (.2); review and edit draft Order entering same (.1); review and edit draft 2004 exam topics to Arrowood (.4);	1.70	\$1,062.50
8/8/2023	Nathan Kuenzi	Draft revisions to 2004 motion and accompanying documents and send to J. Bair (.8);	0.80	\$336.00
8/8/2023	Brian Cawley	Finalize Arrowood demand letters (1.6);	1.60	\$672.00
8/8/2023	Jesse Bair	Continue reviewing and editing draft Section 349 complaint against LMI and Interstate (1.3); correspondence with PSZJ team re same and demand letter (.1);	1.40	\$875.00
8/8/2023	Jesse Bair	Review and edit revised version of draft motion to lift stay to send insurance demands (.4); correspondence with PSZJ re same (.1);	0.50	\$312.50
8/9/2023	Jesse Bair	Review K. Dine suggested edits to the draft Section 349 complaint against LMI and Interstate (.2);	0.20	\$125.00
8/9/2023	Jesse Bair	Correspondence with B. Cawley re exhibits needed for Burns declaration in support of draft 2004 Arrowood motion and motion to lift partial stay to send insurance demands (.1);	0.10	\$62.50

8/9/2023	Brian Cawley	Draft Burns declaration for 2004 motion (1.0); compile and prepare exhibits to Burns declaration for 2004 motion (.9); email J. Bair regarding exhibits (.1);	2.00	\$840.00
8/9/2023	Timothy Burns	Participate in call with state court counsel re Debtor settlement communications (.4); conference with J. Bair re same (.2);	0.60	\$585.00
8/9/2023	Brian Cawley	Correspondence with J. Bair regarding stay motion exhibits (.2);	0.20	\$84.00
8/9/2023	Jesse Bair	Review and edit revised version of draft Rule 2004 motion against Arrowood (.2); conference with T. Burns re debtor settlement communications (.2);	0.40	\$250.00
8/9/2023	Jesse Bair	Review K. Dine suggested edits to the draft 2004 motion against Arrowood (.1);	0.10	\$62.50
8/9/2023	Jesse Bair	Review and incorporate I. Nasatir's suggestions to draft Section 349 complaint against LMI and Interstate (.6);	0.60	\$375.00
8/9/2023	Brian Cawley	Additional edits and revisions to stay motion declaration and accompanying exhibits (.9);	0.90	\$378.00
8/10/2023	Timothy Burns	Met with state court counsel re insurance strategy (.3); met with J. Bair and N. Kuenzi re same and ongoing project (.3); participate in strategy meeting with PSZJ re case developments, insurance strategy, and next-steps (1.1); participate in call with state court counsel re same (.3); correspondence with state court counsel re settlement offers (.3);	2.30	\$2,242.50
8/10/2023	Brian Cawley	Research case law re standing issues in connection with draft motion to lift stay (3.2); answer T. Burns questions re lift stay issues (.5); draft summary of research and send to T. Burns and J. Bair (1.0);	4.70	\$1,974.00
8/10/2023	Jesse Bair	Review J. Stang correspondence re draft 2004 motion and derivative standing issues (.1); review case law re Committee derivative standing (.2);	0.30	\$187.50
8/10/2023	Nathan Kuenzi	Conference with T. Burns and J. Bair re insurance strategy and ongoing projects (.3);	0.30	\$126.00
8/10/2023	Jesse Bair	Participate in team strategy meeting with PSZJ and T. Burns re settlement updates, insurance strategy, and insurance action-items (1.1); conference with T. Burns and N. Kuenzi re insurance strategy and ongoing projects (.3);	1.40	\$875.00
8/11/2023	Jesse Bair	Review joint letter to the Court requesting discovery extensions in the Arrowood district court action and order granting same (.2);	0.20	\$125.00
8/11/2023	Jesse Bair	Review correspondence from the mediators re Evanston response to the Committee's counter (.1);	0.10	\$62.50

8/11/2023	Jesse Bair	Participate in state court counsel meeting for insurance purposes re case developments, strategy, and insurance next-steps (1.8);	1.80	\$1,125.00
8/11/2023	Timothy Burns	Participate in state court counsel meeting for insurance purposes re case developments, strategy, and insurance next-steps (1.8); conference with J. Bair re outcome of same, insurance litigation strategy, and related assignments (.2)	2.00	\$1,950.00
8/11/2023	Brian Cawley	Additional case law research re motion for relief from stay issues (.9);	0.90	\$378.00
8/11/2023	Jesse Bair	Participate in conference with T. Burns re next-steps with case insurance strategy and outcome of state court counsel meeting (.2);	0.20	\$125.00
8/11/2023	Jesse Bair	Review district court order granting the survivors' motion to remand (.2); review correspondence with state court counsel and PSZJ re same (.1);	0.30	\$187.50
8/12/2023	Timothy Burns	Review correspondence with state court counsel and PSZJ re remand ruling (.2); review letter and order re extension of discovery in Arrowood action (.2); correspondence with J. Bair re same (.1); review correspondence from mediator re insurer response to counter (.1);	0.60	\$585.00
8/12/2023	Jesse Bair	Correspondence with T. Burns re status of discovery in the Arrowood district court action (.1);	0.10	\$62.50
8/13/2023	Jesse Bair	Correspondence with B. Cawley re state court counsel lift stay motions (.1);	0.10	\$62.50
8/13/2023	Brian Cawley	Analysis regarding insurance demand letters in connection with lift stay motion (1.2);	1.20	\$504.00
8/14/2023	Jesse Bair	Review and edit revised version of draft Section 349 complaint against LMI and Interstate (1.4);	1.40	\$875.00
8/14/2023	Jesse Bair	Review and finalize Section 349 demand letter to the Diocese (.2);	0.20	\$125.00
8/14/2023	Jesse Bair	Review and edit revised version of Arrowood 2004 Motion (1.5); review and edit revised version of Arrowood 2004 deposition topics (.5); revise and edit proposed Order granting Rule 2004 motion (.1);	2.10	\$1,312.50
8/14/2023	Brian Cawley	Additional revisions to Arrowood 2004 motion (.1);	1.00	\$420.00
8/14/2023	Jesse Bair	Listen to voice-message from the mediator re Lexington negotiations (.1);	0.10	\$62.50
8/14/2023	Jesse Bair	Review Reassignment Order in LMI district court action (.1);	0.10	\$62.50
8/14/2023	Jesse Bair	Analyze and incorporate T. Burns' suggested edits to the draft Section 349 complaint against LMI and Interstate and the draft Section 349 demand letter to the Diocese (.4);	0.40	\$250.00

8/14/2023	Jesse Bair	Review correspondence from LMI re supplemental coverage letter document production (.1);	0.10	\$62.50
8/14/2023	Timothy Burns	Review and revise letter to the Diocese and accompanying draft draft 349 Complaint v. LMI and Interstate (1.4); review remand decision (.4);	1.80	\$1,755.00
8/15/2023	Jesse Bair	Review Arrowood's response to the Committee's letter re non-consensual insurance settlement (.1);	0.10	\$62.50
8/15/2023	Jesse Bair	Review correspondence from I. Nasatir re Arrowood and New York Guarantee Fund issues in connection with same (.1);	0.10	\$62.50
8/15/2023	Jesse Bair	Review K. Dine correspondence re Rule 2004 hearing and briefing deadlines (.1);	0.10	\$62.50
8/15/2023	Jesse Bair	Provide instructions to B. Cawley re preparing revised version of demand letter lift stay motion (.3);	0.30	\$187.50
8/15/2023	Jesse Bair	Review K. Dine correspondence with the Committee re case update and recent developments (.1);	0.10	\$62.50
8/15/2023	Timothy Burns	Review email from J. Bair to BB team with attachments re relief from stay joinders (.2);	0.20	\$195.00
8/16/2023	Jesse Bair	Answer B. Cawley question re edits to partial motions to lift stay to send insurance demands (.1);	0.10	\$62.50
8/16/2023	Brian Cawley	Draft revised, individual motions for relief from stay (2.8); draft revised proposed orders granting individualized relief from stay motions (.5);	3.30	\$1,386.00
8/17/2023	Jesse Bair	Review and respond to correspondence from Arrowood re Rule 2004 meet and confer and potential extension (.2); correspondence with K. Dine re same (.1);	0.30	\$187.50
8/17/2023	Jesse Bair	Review the Diocese's response to the Committee derivative demand letter (.1);	0.10	\$62.50

8/17/2023	Timothy Burns	Review correspondence re 2004 meet and confer with Arrowood's counsel (.1); conference with J. Bair re same (.1); review order re extension of discovery in LMI action (.1); review correspondence between PSZJ and state court counsel re diocese's request for information re Arrowood issues (.2); review J. Azrack's decision re remand (.1); review discovery extension request letter from diocese and LMI (.1); review correspondence from K. Dine re insurance issues (.1); review correspondence with J. Bair and B. Cawley re implementation of demand aspect of insurance strategy (.2); review motions for relief from stay draft papers (.2); participate in portion of weekly call with PSZJ team for insurance purposes re case strategy and next-steps (.5);	1.70	\$1,657.50
8/17/2023	Jesse Bair	Participate in conference with T. Burns re Arrowood Rule 2004 meet and confer (.1);	0.10	\$62.50
8/17/2023	Jesse Bair	Participate in conference with B. Cawley re preparing initial draft of Committee Section 349 derivative standing motion (.2); correspondence with B. Cawley re same and providing additional instructions (.1);	0.30	\$187.50
8/17/2023	Jesse Bair	Review the Diocese's and the insurers' request for discovery extensions in the LMI and Evanston district court actions (.1); review Orders granting same (.1);	0.20	\$125.00
8/17/2023	Jesse Bair	Participate in portion of weekly call with PSZJ team for insurance purposes re case developments, strategy, and next-steps (.5);	0.50	\$312.50
8/17/2023	Brian Cawley	Discuss motion for derivative standing project with J. Bair (.2); being drafting Committee motion for derivative standing (2.5);	2.70	\$1,134.00
8/18/2023	Timothy Burns	Prepare draft materials for case insurance update (.4);	0.40	\$390.00
8/18/2023	Jesse Bair	Prepare for Rule 2004 meet and confer with Arrowood (.2); participate in Rule 2004 meet and confer with Arrowood (.2);	0.40	\$250.00
8/18/2023	Jesse Bair	Review amended notice of hearing re Arrowood 2004 motion (.1);	0.10	\$62.50
8/18/2023	Brian Cawley	Continue drafting Committee motion for derivative standing (4.7);	4.70	\$1,974.00
8/18/2023	Jesse Bair	Draft email memorandum to state court counsel re case insurance update and next-steps (.5);	0.50	\$312.50
8/20/2023	Jesse Bair	Correspondence with T. Burns re draft Committee derivative standing motion (.1);	0.10	\$62.50
8/20/2023	Timothy Burns	Review update email to state court counsel re insurance initiatives (.2);	0.20	\$195.00

8/21/2023	Brian Cawley	Implement partner feedback into motion for derivative standing (1.2); proof and cite-check motion (.9); examine policy exhibits and information for accuracy (.6); draft email with revised motion and exhibit (.2);	2.90	\$1,218.00
8/21/2023	Jesse Bair	Review the Dicoese's and LMI's joint letter to Judge Subramanian re case status in the LMI district court action (.1);	0.10	\$62.50
8/21/2023	Jesse Bair	Review T. Burns' suggested edits to the draft Section 349 derivative standing motion (.2); provide instructions to B. Cawley re edits needed to address same (.2);	0.40	\$250.00
8/21/2023	Timothy Burns	Review and revise Committee motion for derivative standing (1.2);	1.20	\$1,170.00
8/22/2023	Jesse Bair	Review I. Nasatir correspondence re recent Diocesan insurance activities (.1);	0.10	\$62.50
8/22/2023	Timothy Burns	Brief review of latest draft of motion for derivative standing to prosecute section 349 claim (.3); review letter from T. Law and C. Sugayan to court in adversary re discovery schedule and related court order (.2);	0.50	\$487.50
8/22/2023	Jesse Bair	Participate in portion of Committee meeting for insurance purposes (.7);	0.70	\$437.50
8/22/2023	Jesse Bair	Revise and edit the Committee's Section 349 derivative standing motion, including incorporating edits received from PSZJ (2.6); correspondence with PSZJ team re same (.1);	2.70	\$1,687.50
8/22/2023	Jesse Bair	Review agenda for Committee meeting (.1);	0.10	\$62.50
8/23/2023	Jesse Bair	Correspondence with B. Michael re potential LMI counter (.1);	0.10	\$62.50
8/23/2023	Jesse Bair	Participate in call with T. Burns re insurance developments and strategy (.1);	0.10	\$62.50
8/23/2023	Jesse Bair	Analysis re the Diocese's request re the Committee's Rule 2004 Exam of Arrowood (.1); correspondence with T. Burns and PSZJ re same (.1);	0.20	\$125.00
8/23/2023	Timothy Burns	Participate in call with J. Bair re insurance developments and strategy (.1); emails with B. Michael and J. Bair re Diocese's request re Arrowood 2004 exam (.2);	0.30	\$292.50
8/24/2023	Jesse Bair	Identify exhibits to the Burns declaration in support of the Committee's derivative standing motion (.2); provide instructions to B. Cawley and N. Kuenzi re preparing Burns Declaration (.1);	0.30	\$187.50
8/24/2023	Jesse Bair	Review correspondence from K. Dine re case developments and August 25 mediation session (.1);	0.10	\$62.50
8/24/2023	Jesse Bair	Correspond with the mediators re the Committee's response to LMI's latest counter (.1);	0.10	\$62.50

8/24/2023	Jesse Bair	Participate in portion of weekly strategy meeting with PSZJ team for insurance purposes re case insurance status and strategy (.5);	0.50	\$312.50
8/24/2023	Brian Cawley	Prepare exhibits for derivative standing motion (1.0); draft Burns declaraiton for derivative standing motion (.6); draft proposed order granting derivative standing motion (.6); correspond with J. Bair and N. Kuenzi regarding derivative standing motion (.4);	2.60	\$1,092.00
8/24/2023	Jesse Bair	Review the Debtor's suggested edits to the proposed Order granting the Committee's Arrowood Rule 2004 motion (.1);	0.10	\$62.50
8/24/2023	Jesse Bair	Correspondence with Arrowood re potential compromise of the Committee's Rule 2004 exam (.2);	0.20	\$125.00
8/24/2023	Nathan Kuenzi	Assist with finalizing derivative motion declaration and exhibits (.7);	0.70	\$294.00
8/24/2023	Timothy Burns	Review and respond to email from debtor re Arrowood discovery (.1); review email from B. Michael to state court counsel re demand cases (.1);	0.20	\$195.00
8/24/2023	Jesse Bair	Review and edit the Committee's Section 349 derivative standing motion, including incorporation of suggested edits from I. Nasatir (1.1); review and edit Burns declaration and exhibits re same (.1); review and edit draft proposed Order granting the Committee's derivative standing motion (.1); correspondence with PSZJ re revised version of Committee derivative standing motion (.1);	1.40	\$875.00
8/24/2023	Jesse Bair	Analysis re insurance issues re unstayed state court actions in connection with potential insurance settlement (.3); correspondence with state court counsel re same (.2);	0.50	\$312.50
8/25/2023	Timothy Burns	Participate in full-day mediation session (7.4);	7.40	\$7,215.00
8/25/2023	Jesse Bair	Prepare for mediation session (.1);	0.10	\$62.50
8/25/2023	Nathan Kuenzi	Draft revisions to New York Guarantee Fund memorandum to incorporate additional research in connection with potential Arrowood recovery (1.0);	1.00	\$420.00
8/25/2023	Nathan Kuenzi	Supplemental analysis and research in connection with New York Guarantee Fund issues re potential Arrowood recovery (2.2);	2.20	\$924.00
8/25/2023	Jesse Bair	Participate in full-day Zoom mediation session (7.4);	7.40	\$4,625.00
8/25/2023	Jesse Bair	Additional correspondence with Arrowood re potential resolution of the Committee's Rule 2004 motion (.1);	0.10	\$62.50

8/26/2023	Nathan Kuenzi	Review correspondence from T. Burns re Arrowood Guarantee Fund issues (.1); revise research memorandum in connection with same (.2);	0.30	\$126.00
8/26/2023	Jesse Bair	Analysis re status of insurance demand letters and motion to lift stay in order to send same (.3); draft correspondence to BB team re same and providing instructions re additional items needed for completion in order to finalize and file same (.2);	0.50	\$312.50
8/26/2023	Timothy Burns	Email to N. Kuenzi re research assignment re Arrowood (.1);	0.10	\$97.50
8/27/2023	Brenda Horn-Edwards	Draft monthly BB fee statement (.6); generate and edit Exhibit A to same (.1); correspond with J. Bair re same (.1);	0.80	\$288.00
8/27/2023	Brian Cawley	Correspond with J. Bair regarding Burns declaration for derivative standing motion (.2);	0.20	\$84.00
8/28/2023	Brian Cawley	Discuss status of derivative standing and lift stay motions with T. Burns (.3);	0.30	\$126.00
8/28/2023	Brian Cawley	Organize and circulate state court counsel demand letters (.6);	0.60	\$252.00
8/28/2023	Brian Cawley	Correspondence with state court counsel regarding motion to lift stay and related insurance demands (.5);	0.50	\$210.00
8/28/2023	Jesse Bair	Review correspondence from the mediators re LMI's latest mediation counter (.1);	0.10	\$62.50
8/28/2023	Timothy Burns	Reviewed and responded to mediator's email re LMI's counter (.1); met with B. Cawley re ongoing insurance projects (.3); analyze documents relating to the Debtor's proposal to state court counsel re potential settlements (.8);	1.20	\$1,170.00
8/29/2023	Jesse Bair	Review correspondence from the mediators re Allianz counter offer and potential derivative standing motion extension request (.1); review correspondence with T. Burns and PSZJ team re potential response to same (.1); review additional correspondence with T. Burns and the mediators re same (.1);	0.30	\$187.50
8/29/2023	Jesse Bair	Review K. Dine correspondence with the Committee re August 25 mediation outcome and next-steps (.1);	0.10	\$62.50
8/29/2023	Jesse Bair	Review correspondence with K. Dine and B. Michael re Arrowood Rule 2004 reply brief and edits to proposed order granting the Committee's motion (.1);	0.10	\$62.50

8/29/2023	Timothy Burns	Reviewed mediators' recent correspondence re insurance issues (.2) correspondence with committee professionals re same (.2); call with J. Stang re same (.3); prepared response to same (.2); call with state court counsel re same (.2); prepared for state court counsel meeting (.4); participate in state court counsel meeting for insurance purposes (1.2); reviewed and responded to additional correspondence from mediators (.1);	2.80	\$2,730.00
8/29/2023	Jesse Bair	Review draft Order approving 8th interim fee applications (.1);	0.10	\$62.50
8/30/2023	Brian Cawley	Participate in conference with T. Burns and N. Kuenzi re motions for partial summary judgment re consent to settle issue against LMI and Interstate (.3);	0.30	\$126.00
8/30/2023	Brian Cawley	Draft motion for partial summary judgment on consent to settle issue for Interstate (1.6); draft motion for partial summary judgment on consent to settle issue for LMI (1.5); implement T. Burns feedback into motions (.3);	3.40	\$1,428.00
8/30/2023	Nathan Kuenzi	Participate in conference with T. Burns and B. Cawley re motions for partial summary judgment re consent to settle issue against LMI and Interstate (.3);	0.30	\$126.00
8/30/2023	Brian Cawley	Begin analyzing recent 9019 ruling in Camden for potential impact on DRVC case (.3);	0.30	\$126.00
8/30/2023	Timothy Burns	Conference with B. Cawley and N. Kuenzi re motions for partial summary judgment re consent to settle issue against LMI and Interstate (.4); call with state court counsel re same (.2); call with J. Stang re same (.2); reviewed Camden plan confirmation and insurance settlement decisions re insurance issues in DRVC case (1.8); reviewed and revised motions for partial summary judgment against LMI and Interstate re consent to settle issue (2.2); call with state court counsel re same (.2);	5.00	\$4,875.00
8/30/2023	Nathan Kuenzi	Analyze issues pertaining to potential confidentiality and/or privilege arguments that Arrowood may raise in response to 2004 motion (1.5);	1.50	\$630.00
8/30/2023	Jesse Bair	Review correspondence with T. Burns and K. Dine re potential insurance partial summary judgment motions (.1);	0.10	\$62.50
8/30/2023	Jesse Bair	Preliminary analysis re recent confirmation decision from the Diocese of Camden case (.1);	0.10	\$62.50
8/30/2023	Brian Cawley	Draft Committee joinder to individualized motions for relief from stay to send insurance demands (2.2);	2.20	\$924.00

8/31/2023	Brian Cawley	Conference with T. Burns re motion for relief from stay joinder(.2); participate in strategy meeting with PSZJ team re case insurance strategy, status, and ongoing projects (1.3); follow-up on action items from same (.5);	2.00	\$840.00
8/31/2023	Jesse Bair	Review Lexington's request for an extension to respond to the Committee's derivative standing motion (.1);	0.10	\$62.50
8/31/2023	Brian Cawley	Revise individualized lift stay motions (.3);	0.30	\$126.00
8/31/2023	Timothy Burns	Participate in call with state court counsel re insurance developments (.2); reviewed and revised motion for relief from stay joinder (1.4); met with B. Cawley re same (.2); participate in weekly strategy call with PSZJ team re case insurance strategy, status, and ongoing projects (1.3); review correspondence from K. Dine re adjournment of derivative standing hearing (.1); email to mediators re same (.1); reviewed and responded to email from Lexington's counsel re same (.1); continued analysis re case insurance strategy and next-steps (.6);	4.00	\$3,900.00
8/31/2023	Jesse Bair	Review Evanston's response to the Committee's Section 3420 notice letter (.1);	0.10	\$62.50
8/31/2023	Brian Cawley	Continue analyzing Camden 9019 ruling for material pertinent to DRVC case (1.6);	1.60	\$672.00
8/31/2023	Jesse Bair	Review correspondence with K. Dine and Chambers re the adjournment of the Committee's derivative standing motion (.1); review correspondence with the mediators re same (.1);	0.20	\$125.00
8/31/2023	Brian Cawley	Revise and edit Committee joinder in support of lift stay motions to incorporate partner edits (.6);	0.60	\$252.00
8/31/2023	Nathan Kuenzi	Analyze issues relating to deliberative process privilege in connection with Arrowood 2004 motion (2.2);	2.20	\$924.00

Total Hours and Fees**207.70 \$118,810.60****Timekeeper Summary**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alyssa Turgeon	1.20	\$360.00	\$432.00
Brenda Horn-Edwards	0.80	\$360.00	\$288.00
Brian Cawley	74.20	\$420.00	\$31,164.00
Jesse Bair	41.80	\$625.00	\$26,125.00
Katie Sticklen	20.20	\$378.00	\$7,635.60
Nathan Kuenzi	26.30	\$420.00	\$11,046.00
Timothy Burns	43.20	\$975.00	\$42,120.00

Total Due This Invoice: \$118,810.60